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8 Attorneys for Plaintiff
9 ConsumerTrack, Inc.

10
11 **UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA**
13 **WESTERN DIVISION**

14 CONSUMERTRACK, INC., a
15 California corporation,

16 Plaintiff,

17 v.

18 ADVERTISING DIRECT, LLC d/b/a
19 BLUE C ADS, a Florida limited liability
20 company, and DOES 1-10,

21 Defendants.

Case No. 2:17-cv-02404 PA(FFMx)

22 **DECLARATION OF NATHAN**
23 **DURRANCE IN SUPPORT OF**
24 **PLAINTIFF**
25 **CONSUMERTRACK, INC'S**
26 **MOTION FOR DEFAULT**
27 **JUDGMENT AGAINST BLUE**
28 **OCEAN ADS, LLC**

Date: September 11, 2017
Time: 1:30 p.m.
Courtroom: 9A

I, Nathan Durrance, declare as follows:

1. I am over the age of eighteen (18) years, and competent to testify to the matters set forth in this declaration. I make this declaration from personal knowledge of these matters.

2. I am counsel for the Plaintiff in the above-captioned action and I am familiar with the file, records and pleadings in this matter. I submit this declaration in support of Plaintiff ConsumerTrack, Inc's Motion For Default Judgment.

3. Attached hereto as Exhibit A is a true and correct copy of Plaintiff's Second Amended Complaint For Declaratory Judgment And Breach Of Contract

1 against Blue Ocean Ads, LLC. The Second Amended Complaint was served on
2 Blue Ocean Ads, LLC on May 19, 2017.

3 4. Attached hereto as Exhibit B is a true and correct copy of the Summons
4 also served on Blue Ocean Ads, LLC on May 19, 2017.

5 5. Attached hereto as Exhibit C is true and correct copy of the Proof of
6 Service of Summons and Complaint on defendant Blue Ocean Ads, LLC dated
7 May 11, 2017.

8 6. Under Rule 12 of the Federal Rules of Civil Procedure, defendant Blue
9 Ocean Ads, LLC was required to respond, answer or otherwise please to Plaintiff's
10 Second Amended Complaint by June 9, 2017. Defendant Blue Ocean Ads, LLC,
11 nor anyone claiming to represent defendant Blue Ocean Ads, LLC, has contacted
12 anyone at Newman Du Wors LLP to request an extension to respond to Plaintiff's
13 Second Amended Complaint.

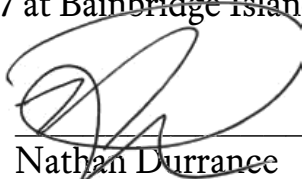
14 7. As of August 10, 2017, defendant Blue Ocean Ads, LLC has not served
15 Newman Du Wors LLP with a response, answer or pleading to Plaintiff's Second
16 Amended Complaint.

17 8. Defendant Blue Ocean Ads, LLC is not a minor or an incompetent
18 person

19 9. Defendant Blue Ocean Ads, LLC is not currently in the military service,
20 and therefore the Servicemembers Civil Relief Act does not apply.

21
22 I declare under penalty of perjury that the foregoing is true and correct.

23
24 Executed the 10th day of August, 2017 at Bainbridge Island, Washington.

25
26 
27 Nathan Durrance
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